## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA Philadelphia Division

Tri-State Paper, Inc.,		Chapter 23-13237-pmm
		Chapter 23-13237-pmm Case No. 11
	Debtor.	
Tri-State Paper, Inc.,		Adversary No. 23-00073-pmm
	Plaintiff,	_
v.		
Bowling Green, Inc.,		
	Defendant.	

## Plaintiff's Motion to Compel Discovery

Plaintiff Tri-State Paper, Inc., through its attorney, moves this Court as follows:

- 1. The Clerk recently entered judgment against Defendant Bowling Green, Inc.
- 2. On March 15, 2024, the Plaintiff served the Defendant with the interrogatories attached as Exhibit A.
- 3. Because the Defendant has failed to respond to the interrogatories, the Plaintiff requests that the Court issue an order compelling the Defendant's response.
- 4. The Plaintiff requests that the Court grant this motion without a hearing as allowed by L.B.R. 9014-2(13).

For those reasons, the Court must grant relief in the form of order attached, and further in the Plaintiff's favor if necessary and proper under the law.

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Date: May 28, 2024 CIBIK LAW, P.C.

Attorney for Plaintiff

By:

Mike Assad (#330937) 1500 Walnut Street, Suite 900 Philadelphia, PA 19102 215-735-1060 help@cibiklaw.com

## **Certificate of Service**

I certify that on this date, I did cause a copy of this document and all attachments to be electronically served on all parties on the Clerk's service list that are registered to receive notices through the CM/ECF system. I did not serve anyone by mail.

Date: May 28, 2024

Mike Assad